

Exhibit I

IN THE UNITED STATES DISTRICT COURT FOR THE
SOUTHERN DISTRICT OF NEW YORK

-----x

ULKU ROWE,

Plaintiff,

-against-

GOOGLE LLC,

Defendant.

Case No: 19-cv-08655 (JHR)

-----x

October 2, 2023

9:12 a.m.

Videotaped Deposition of NonParty
Witness PATRICIA FLORISSI, pursuant to Notice,
before CINDY A. AFANADOR, Certified Shorthand
Reporter, Registered Professional Reporter,
Certified Realtime Reporter, Registered Merit
Reporter, NYSRCR, NYSACR and Notary Public of
the State of New York.

**THIS TRANSCRIPT CONTAINS CONFIDENTIAL
PORTIONS DESIGNATED BY COUNSEL**

1 Patricia Florissi

2 we need to call the judge on this, we're
3 prepared to do so.

4 Q. Do you expect to give testimony
5 about any documents at trial?

6 A. I'm not sure. I don't think so.

7 Q. Do you expect to testify about
8 Ms. Rowe's performance during the time that
9 she was working with you?

10 A. I expect to do so.

11 Q. And what do you expect to say
12 about Ms. Rowe's performance?

13 A. I expected more of her
14 performance.

15 Q. And what did you expect more of?

16 A. I expected to see more artifacts,
17 more as what we call with Google documents
18 that had been authored by Ulku, that described
19 the projects that she was personally involved
20 in.

21 Q. Was there anything else that you
22 expected more of Ms. Rowe that you will
23 testify at trial?

24 A. There are other things that I
25 expect more.

1 Patricia Florissi

2 Q. Okay.

3 And what are those?

4 A. I would expect more
5 predictability in terms of when she could or
6 could not attend group meetings or individual
7 one-on-ones.

8 Q. Anything else that you expected
9 more of that you will testify to at trial?

10 A. That I would be notified further
11 ahead in advance of vacation time or time off.

12 Q. Anything else that you expect to
13 testify at trial about expecting more of her
14 performance?

15 A. More interactions with the Google
16 engineering teams, product managers.

17 Q. You said engineering and product
18 managers?

19 A. Yes.

20 Q. Anything else that you expect to
21 testify to with respect to your expectations
22 of her performance?

23 A. In specific projects that Google
24 has Ulku has worked on especially the trusted
25 AI that blended into safety AI, I would like

1 Patricia Florissi

2 to have seen more leadership in leading the
3 cause.

4 Q. Anything else?

5 A. Ulku said that she spent the
6 first half of the year or three months
7 studying and learning about generative AI, I
8 would like to have seen documents that
9 described her position, point of view, that
10 she would share with the team what she had
11 learned, that she would give pointers to
12 documents, interesting documents that she had
13 read.

14 Q. Anything else with respect to her
15 performance that you expect to testify about
16 at trial?

17 A. I don't know if I am
18 comprehensive, if there are -- it's a broad
19 question. There may be other details.

20 Q. Any other details that you
21 remember sitting here right now?

22 A. Let me think. Follow through.
23 Follow through. I made suggestions for Ulku
24 to talk to people. I'll give you a specific
25 example: We had a meeting and we discussed in